



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-3

February 17, 2000

Alec Poitevint, Treasurer  
Republican National Committee - RNC  
310 First Street, SE  
Washington, DC 20003

Identification Number: C00003418

Reference: February Monthly (1/1/99-1/31/99), March Monthly (2/1/99-2/28/99),  
April Monthly (3/1/99-3/31/99), May Monthly (4/1/99-4/30/99), June  
Monthly (5/1/99-5/31/99), July Monthly (6/1/99-6/30/99), August  
Monthly (7/1/99-7/31/99), September Monthly (8/1/99-8/31/99) and  
October Monthly (9/1/99-9/30/99) Reports

Dear Mr. Poitevint:

On January 27, 2000, you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Your February 11, 2000, response is incomplete because you have not provided all the requested information. For this response to be considered adequate, the following information is still required.

-The Campaign Guide for Political Party Committees was written to help political parties at the local, state and national levels comply with the federal campaign finance law; however, there are certain reporting requirements that are specific to National Party Committees that are not addressed in the Campaign Guide. The Campaign Guide should be used as a reference guide only and should not be used in lieu of the Code of Federal Regulations or the Federal Election Campaign Act. Therefore, you should refer to the following reporting requirements for National Party Committees with respect to corporate in-kind contributions.

In accordance with 11 CFR 104.8(e), a National Party Committee shall disclose in a memo Schedule A, information about each individual, committee, corporation, labor organization, or other entity that donates in

excess of \$200 in a calendar year to the committee's non-federal account(s). Furthermore, in accordance with 11 CFR 104.9(c), a National Party Committee shall report in a memo Schedule B the full name and mailing address of each person to whom a disbursement in an aggregate amount or value in excess of \$200 within the calendar year is made from the committee's non-federal account(s), together with the date, amount and purpose of such disbursement.

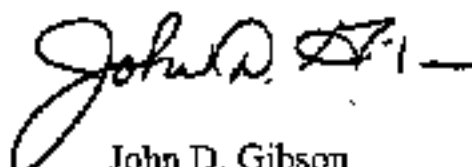
Advisory Opinion 1992-33 discloses alternative methods for reporting the receipt of these contributions on the Committee's I Schedules. The full amount of the in-kind contributions received by the non-federal account should be disclosed on Schedule I with a supporting memo Schedule A that itemizes each contributor's identification. In addition, in order to reflect the fact that the reported in-kind donations have been expended in the same period as received by the committee, the total amount of the in-kind contributions should be entered on Line 5 of Schedule I as an other disbursement with a notation reference to the memo Schedule A filed for Line 1. Alternatively, the committee may include the total amount of the in-kind contributions to the non-federal account on Line 1 and then make a cross reference to the entries on Schedule H4 to which the total amount relates. This reference should specify particular pages of the Schedule H4 where the in-kind donors are identified.

Please amend your reports to accurately disclose the non-federal in-kind contributions in accordance with one of the methods described above.

If this information is not received by the Commission within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Scott Francis on our toll-free number (800) 424-9530 or our local number (202) 694-1130.

Sincerely,



John D. Gibson  
Assistant Staff Director  
Reports Analysis Division